

Message

From: Dickens, Brian [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=416CD582A67D44AAB91D3BEFF56B892D-BDICKENS]
Sent: 8/7/2018 4:08:54 PM
To: James.Kavalec@epa.ohio.gov; 'Brad, Miller' [Brad.Miller@hamilton-co.org]
CC: Harrison, Gina [harrison.gina@epa.gov]
Subject: AK Steel NOV - Evidence to Ohio
Attachments: AK Steel inspection report 050818.pdf; AK Steel inspection report 052418.pdf; Summary of AK coke battery violations (excluding oven door VEs).docx

Jim:

On May 8th, May 23rd, and May 24th, EPA CAA inspectors performed inspections of AK Steel's No. 2 Coke Oven Battery (Battery) in Middletown, Ohio. Upon reviewing the data collected during the inspection, EPA identified three categories of violations at the Battery, as follows:

1. **Visible emissions leaking from oven doors**, in violation of the Ohio SIP at OAC 3745-17-07(B)(2)(d)(ii), and Title V Permit condition B918 (b)(1)(b). The Ohio SIP and Title V Permit require that at no time shall there be visible fugitive emissions from more than ten [(10)] percent of the oven doors. On May 8th, inspectors observed visible fugitive particulate emissions leaking from 14 out of 152 oven doors during one observation, at a rate of 9.2%, and from 24 out of 152 doors during the second observation, at a rate of 15.8%. On May 23rd, inspectors observed visible fugitive particulate emissions leaking from 16 out of 152 doors, at a rate of 10.5% .
2. **Visible emissions leaking from offtake piping**, in violation of the Ohio SIP at OAC 3745-17-07(B)(2)(b), and Title V Permit condition B918 (b)(1)(f). The Ohio SIP and Title V Permit each require that at no time shall there be visible fugitive emissions from more than ten [(10)] percent of the [Battery's] offtake piping, as defined at OAC 3745-17-03(B). On May 8th, inspectors observed visible fugitive particulate emissions leaking from the offtake piping associated with 21 out of 152 ovens, at a rate of 13.8%. On May 23rd, inspectors observed visible fugitive particulate emissions leaking from the offtake piping associated with 25 out of 152 ovens, at a rate of 16.4%.
3. **Excessive visible emissions during charging operations**, in violation of the Ohio SIP at OAC 3745-17-07(B)(2)(a), and Title V Permit condition B918 (b)(1)(h). The Ohio SIP and Title V Permit each require that no visible particulate emissions from any charging operation shall exceed one hundred twenty-five [(125)] seconds during any five consecutive charges. On May 24, 2018, an EPA inspector observed 168 seconds of visible emissions from charging operations during five consecutive charges from 12:51 pm and 2:17 pm.

Ohio EPA issued an NOV to AK Steel on May 29, 2018, for violations of OAC 3745-17-07(B)(2)(d)(ii) and AK Steel's Title V Permit. Evidence collected by EPA inspectors during the May inspections support an additional NOV for violations of OAC 3745-17-07(B)(2)(b), OAC 3745-17-07(B)(2)(a), and Title V Permit conditions B918 (b)(1)(f) and (h). EPA's inspection reports and a summary of visible emission observations are each attached. As we discussed, we understand Ohio EPA will issue an NOV for these violations.

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